

JUDGE LYNCH

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

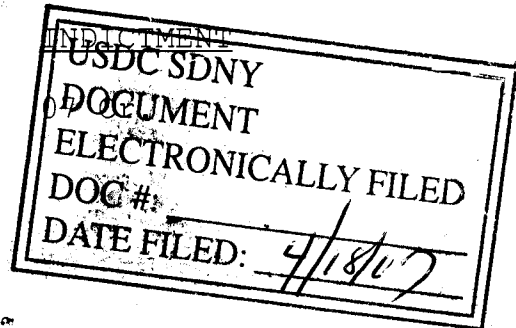
07 CRIM. 321

UNITED STATES OF AMERICA

-v.-

YUAN CHANG CHIOU,
a/k/a "Brother Chiou,"

Defendant.



COUNT ONE

The Grand Jury charges:

1. From at least in or about 2006, up to and including in or about July 2006, in the Southern District of New York and elsewhere, YUAN CHANG CHIOU, a/k/a "Brother Chiou," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1029(a)(1).

2. It was a part and an object of the conspiracy that YUAN CHANG CHIOU, a/k/a "Brother Chiou," the defendant, and others known and unknown, with intent to defraud, would and did produce, use, and traffic in one and more counterfeit access devices, in violation of Title 18, United States Code, Section 1029(a)(1).

Overt Acts

3. In furtherance of this conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about 2006, YUAN CHANG CHIOU, a/k/a "Brother Chiou," the defendant, had a conversation with a co-conspirator not named herein, in which CHIOU asked the co-conspirator to recruit restaurant workers who would be willing to steal patrons' credit card numbers in exchange for money;

b. In or about 2006, a co-conspirator not named herein, called an individual in Manhattan, who worked at a Chinese restaurant in Manhattan, in an effort to recruit that individual to steal credit card numbers for YUAN CHANG CHIOU, a/k/a "Brother Chiou," the defendant; and

c. On or about July 10, 2006, YUAN CHANG CHIOU, a/k/a "Brother Chiou," the defendant, participated in a telephone conversation in Queens, New York, in which he agreed to have 10 counterfeit credit cards produced for sale on July 11, 2006.

(Title 18, United States Code, Section 1029(b)(2).)

COUNT TWO

The Grand Jury further charges:

4. From at least in or about 2006, up to and including in or about July 2006, in the Southern District of New York and elsewhere, YUAN CHANG CHIOU, a/k/a "Brother Chiou," the

defendant, unlawfully, willfully and knowingly, and with intent to defraud, did produce, use, and traffic in one and more counterfeit access devices, and thereby did affect interstate commerce, to wit, CHIOU participated in the production, use and sale of counterfeit credit cards.

(Title 18, United States Code, Sections 1029(a)(1) and 2.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

- v. -

**YUAN CHANG CHIOU,
a/k/a "Brother Chiou,"**

Defendant.

INDICTMENT

07 CR ____

(Title 18, United States Code, Sections 1029(a)(1), (b)(2)
and 2).

Michael J. Garcia
United States Attorney.

A TRUE BILL

Rosemarie C. Agnew

Foreperson.

*cc
4/18/07
Indictment filed, arrest warrant issued.
F. Mass, USMT*